STATE OF MISSOURI
Matt Blunt, Governor • Doyle Childers, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

JAN 2 7 2006

Mr. Joseph Metzger, Plant Manager
Kraft Foods Global, Inc.
2035 East Bennett
Springfield, MO 65804

Re: Kraft Foods Global, Inc., 077-0026
Permit Number: **OP2006-004**

Dear Mr. Metzger:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:csb

Enclosures

c: Ms. Tamara Freeman, U.S. EPA Region VII
Mr. Paul Vitzthum, Southwest Regional Office
PAMS File: 2005-05-019

Missouri Department of Natural Resources
Air Pollution Control Program

PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: **OP2006-004**
Expiration Date: JAN 2 6 2011
Installation ID: 077-0026
Project Number: 2005-05-019

Installation Name and Address
Kraft Foods Global, Inc.
2035 East Bennett
Springfield, MO 65804
Greene County

Parent Company's Name and Address
Kraft Foods Inc.
Three Lakes Drive
Northfield, IL 60093-2753

Installation Description:
Kraft Foods Global, Incorporated is a food processing and manufacturing installation. The primary products are cheese, pasta, pasta sauces and cream cheese. The processing activities include milling, cooking and drying.

JAN 2 7 2006
Effective Date

Director or Designee
Department of Natural Resources

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• Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Kraft Foods Global, Incorporated is a food processing and manufacturing installation. The primary products are cheese, pasta, pasta sauces and cream cheese. The processing activities include milling, cooking and drying.

	Reported Air Pollutant Emissions, tons per year						
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO_x)	Nitrogen Oxides (NO_x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2004	12.98	0.08	16.17	4.43	13.58	-	0.31
2003	12.11	0.08	14.83	4.03	12.46	-	0.28
2002	11.02	0.08	14.15	4.77	11.88	-	0.27
2001	10.15	0.08	15.06	5.45	12.65	-	0.28
2000	10.00	0.08	14.74	5.02	12.38	-	-

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit	EIQ Point #
	Boilers	
EU0010	Boiler #1	EP-30
EU0020	Boiler #2	EP-31
	Process Heaters	
EU0030	Spray Dryer for Powdered Cheese	DP-1
EU0040	Drum Dryer Exhaust	DP-2
	Other	
EU0050	Grain Receiving Railcar Unloading in Train Shed	EP-04
EU0060	Flour Regrind Dust Collector	EP-05
EU0070	Flour Regrind Pasta Receiving Filter Exhaust	EP-06
EU0080	Flour Regrind Pasta Mill Exhaust	EP-07
EU0090	Process Flour Holding Tank Dust Collector (Regrind Room)	EP-08
EU0100	Flour Unloading Vacuum Exhaust	EP-22
EU0110	Baghouse for Drying Plant Powders (fka Liquid DCO Process)	DP-7
EU0120	Pasta 2nd Floor Conveyor Dust Collector	EP-41
EU0130	Natural Cuts Bulk Powder Dumping Dust Collector	EP-42
EU0140	Final Dryer D Finished Goods Dust Collector	EP-43
EU0150	Natural Cuts Boudalay Dust Collector	EP-20
EU0160	Bean Gum Exhaust	EP-12

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Source	EIQ Point #
Cheese cookers at drying plant	DP-3
Pasta pre-dryer exhaust	EP-09
Pasta final dryer exhaust	EP-11
Lab ether exhaust	EP-13
Process cheese salt handling room and salt brine silo	EP-15 and EP-34
Process cheese blenders/cookers	EP-26
30,000-gallon fuel oil storage tanks	EP-28, EP-29

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

1) Construction Permit 0898-197 issued by the Springfield, Missouri Air Pollution Control Authority on August 12, 1998, with revision specified in the Statement of Basis.

• Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

PERMIT CONDITION PW001
Voluntary Limitation

Emission Limitation:

The permittee shall discharge into the atmosphere from the entire installation less than 90.00 tons of particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM-10) in any consecutive 12-month period.

Monitoring/Record Keeping:

1) The permittee shall maintain an accurate record of emissions of PM-10 emitted into the atmosphere from this installation. The permitee shall record the monthly and running 12-month totals of the PM-10 emissions from this facility. The permittee shall use Attachment A (Monthly PM-10 Emissions Tracking Record) or an equivalent form for this purpose.
2) The permittee shall maintain these records on site for the most recent 60 months.
3) The permittee shall immediately make such records available to any Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the end of the month, if the 12-month cumulative total records show that the source exceeded the limitation of 90.00 tons of PM-10.

PERMIT CONDITION PW002
Voluntary Limitation

Emission Limitation:

The permittee shall discharge into the atmosphere from the entire installation less than 90.00 tons of sulfur dioxide (SO_2) in any consecutive 12-month period.

Monitoring/Record Keeping:

1) The permittee shall maintain an accurate record of emissions of SO_2 emitted into the atmosphere from this installation. The permitee shall record the monthly and running 12-month totals of the SO_2 emissions from this facility. The permittee shall use Attachment B (Monthly SO_2 Emissions Tracking Record) or an equivalent form for this purpose.
2) The permittee shall maintain these records on site for the most recent 60 months.
3) The permittee shall immediately make such records available to any Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the end of the month, if the 12-month cumulative total records show that the source exceeded the limitation of 90.00 tons of SO_2.

PERMIT CONDITION PW003
Voluntary Limitation

Emission Limitation:

The permittee shall discharge into the atmosphere from the entire installation less than 90.00 tons of nitrogen oxides (NO_X) in any consecutive 12-month period.

Monitoring/Record Keeping:

1) The permittee shall maintain an accurate record of emissions of NO_X emitted into the atmosphere from this installation. The permitee shall record the monthly and running 12-month totals of the NO_X emissions from this facility. The permittee shall use Attachment C (Monthly NO_X Emissions Tracking Record) or an equivalent form for this purpose.
2) The permittee shall maintain these records on site for the most recent 60 months.
3) The permittee shall immediately make such records available to any Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the end of the month, if the 12-month cumulative total records show that the source exceeded the limitation of 90.00 tons of NO_X.

PERMIT CONDITION PW004
Voluntary Limitation

Emission Limitation:

The permittee shall discharge into the atmosphere from the entire installation less than 90.00 tons of carbon monoxide (CO) in any consecutive 12-month period.

Monitoring/Record Keeping:

1) The permittee shall maintain an accurate record of emissions of CO emitted into the atmosphere from this installation. The permitee shall record the monthly and running 12-month totals of the CO emissions from this facility. The permittee shall use Attachment D (Monthly CO Emissions Tracking Record) or an equivalent form for this purpose.
2) ~~The permittee shall maintain these records on site for the most recent 60 months.~~
3) The permittee shall immediately make such records available to any Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the end of the month, if the 12-month cumulative total records show that the source exceeded the limitation of 90.00 tons of CO.

• Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 AND EU0020 – BOILERS			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0010	Boiler #1, 1997, normally natural gas fired but using distillate fuel oil as backup, MHDR of 72.5 MMBtu/hr	ABCO/9639-1	EP30
EU0020	Boiler #2, 1997, normally natural gas fired but using distillate fuel oil as backup, MHDR of 72.5 MMBtu/hr	ABCO/9639-3	EP31

PERMIT CONDITION (EU0010 AND EU0020)-001

10 CSR 10-6.070 New Source Performance Regulations and
40 CFR Part 60, Subpart A General Provisions and Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Emission Limitations:

Particulate Matter:

1) On and after the date on which the initial performance test is completed or required to be completed under §60.8 of this part, whichever date comes first, no owner or operator of an affected facility that combusts coal, wood, or oil and has a heat input capacity of 8.7 MW (30 million Btu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.
2) These PM and opacity standards apply to an emission unit at all times when it is burning anything other than natural gas, except during periods of startup, shutdown, or malfunction. They do not apply when it is burning natural gas.

Sulfur Dioxide (SO_2):

3) On and after the date on which the initial performance test is completed or required to be completed under §60.8 of 40 CFR Part 60, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO_2 in excess of 215 ng/J (0.50 lb/million Btu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur.
4) Compliance with these SO_2 emission limits and fuel oil sulfur limits shall be determined on a 30-day rolling average basis.
5) These SO_2 emission limits and fuel oil sulfur limits apply at all times, including periods of startup, shutdown, and malfunction.

Operational Limitation:

These emission units shall be limited to burning either distillate fuel oil that contains not more than 0.5

weight percent sulfur on a 30-day rolling average basis, or natural gas.

Monitoring/Record Keeping:

Particulate Matter:

1) The permittee shall conduct opacity readings on these emission units using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and burning any fuel other than natural gas, and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
2) These opacity readings shall be conducted on a boiler once each day during which it burns any fuel other than natural gas, at a time when it is not burning natural gas. Opacity readings are not necessary on a boiler on days when it burns natural gas exclusively.
3) The permittee shall maintain records of all Method 22 observation results (See Attachment F1 or F2.), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
4) The permittee shall maintain records of any equipment malfunctions. (See Attachment E.)
5) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment G.)
6) Attachments F1 or F2, E, and G are forms satisfying these record keeping requirements. These forms or equivalents created by the permittee must be used to certify compliance with this requirement.
7) The permittee shall maintain all records required for particulate matter under this permit condition for five years. They must be maintained on-site for two years. They may be kept in either written or electronic form.
8) These records shall be made available immediately for inspection to Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.

Sulfur Dioxide (SO_2):

9) The permittee shall maintain documentation supporting that the fuel used in these emission units for any given time period is either distillate fuel oil that contains not more than 0.5 weight percent sulfur on a 30-day rolling average basis, or natural gas.
10) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
11) Compliance with the distillate fuel oil sulfur limits may be determined based on certifications from the fuel supplier(s). 1. Fuel supplier certification for distillate fuel oil shall include the following information:
    a) The name of the oil supplier, and
    b) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.
    c) Sulfur content of distillate fuel oil by weight percent

    Note: Fuel supplier certification is not required for the pipeline grade natural gas.
12) The permittee shall maintain all records required for SO_2 under this permit condition for a period of

two years following the date of such record.

Reporting:

Particulate Matter:

1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.

Sulfur Dioxide (SO_2):

2) The permittee shall submit a semi-annual report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802. The report shall be postmarked by October 1st for monitoring which covers the January through June time period and by April 1st for monitoring which covers the July through December time period. This report shall include the following information:
   a) Calendar dates covered in the reporting period,
   b) Records of the amounts of each fuel combusted during each day,
   c) Each 30-day average sulfur content by weight percent calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
   d) Each 30-day average percent of potential SO_2 emission rate calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of the corrective actions taken.
   e) Records of any fuel supplier certifications, as described in 2) in the Monitoring/Record Keeping section of this permit condition.
   f) In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the responsible official that "The records of fuel supplier certifications submitted represent all of the distillate fuel oil combusted during the time period being reported."

Both Particulate Matter and Sulfur Dioxide (SO_2):

3) The permittee shall report any deviations/exceedances of the operational limitation of this permit condition and any deviations from the monitoring,/record keeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION (EU0010 AND EU0020)-002

Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 2 Visible Air Contaminants from Equipment

Emission Limitation:

No person shall discharge or permit the discharge of, into the outside atmosphere, from any single new source of emission whatsoever, any air contaminant:

1) Of a shade or density equal to or darker than that designated as number 1 on the Ringelmann smoke chart (20 percent opacity); or
2) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke of a shade or density equal to or darker than that designated as number 1 on the Ringelmann smoke chart (20 percent opacity).
3) Exceptions:

a) Air contaminants of a shade, density or opacity equal to but not darker than that designated as number 2 on the Ringelmann chart (40% opacity) so long as the emission shall not exist for a period aggregating more than six minutes in any consecutive 60-minute period;
b) Air contaminants of a shade, density or opacity equal to but not darker than that designated as number 3 (60% opacity) on the Ringelmann chart so long as the emission shall not exist for a period aggregating more than six minutes in any consecutive 60-minute period and the emission is caused by the starting of or cleaning of a fire, and so long as such emissions do not occur on more than three occasions during any consecutive 24-hour period;
c) Air contaminants which fail to meet the requirements of section 6-211 or 6-212 only because of the presence therein of uncombined water; or
d) Air contaminants resulting from an unavoidable breakdown or malfunction of equipment.

MonitoringRecord Keeping/Reporting:
When in compliance with Permit Condition (EU0010 and EU0020)-001, which has more stringent opacity limitations than this one, the permittee will also be in compliance with this permit condition. No additional monitoring, record keeping, or reporting is required.

PERMIT CONDITION (EU0010 AND EU0020)-003

Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 3 Particulate Matter from Fuel Burning Equipment

Emission Limitations:
1) The permittee shall not cause, allow or permit the emission of particulate matter from these boilers in excess of 23.9 pounds per hour each. Attachment H explains how this figure was obtained from the ordinance.
2) Compliance with this emission limitation shall not be determined during periods when a new fire is being built, during start-up, change of load or fueling, during an operational breakdown or other emergency conditions, while air pollution control equipment is being cleaned or repaired, or during soot blowing, but shall be determined during steady state conditions.

Operational Limitation:
These emission units shall be limited to burning either distillate fuel oil or natural gas.

Monitoring/Record Keeping:
1) The permittee will be in compliance with this regulation as long these emission units burn either distillate fuel oil or natural gas. Attachment H contains calculations demonstrating this. The permittee shall keep this attachment with the rest of this permit.
2) The operational limitation for this permit condition is less restrictive than the operational limitation for permit condition (EU0010 and EU0020)-001. When in compliance with that operational limitation, the permittee will also be in compliance with this one.

Reporting:
The permittee shall report any deviations/exceedances of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EU0030 AND EU0040 – PROCESS HEATERS			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0030	Spray Dryer for Powdered Cheese with wet scrubber,1993, natural gas-fired, MHDR of 11.0 MMBtu/hr and 1.76 tons product/hr	Maxon burner/RGIV	DP-1
EU0040	Drum Dryer Exhaust with baghouse and wet scrubber, 1993, natural gas fired, MHDR of 7 MMBtu/hr and 1.76 tons product/hr	Unknown	DP-2

PERMIT CONDITION (EU0030 AND EU0040)-001
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Emission Limitations:

1) Emissions from any existing or new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation:

These emission units shall be limited to burning pipeline grade natural gas.

Monitoring/Record Keeping:

The permittee shall maintain documentation supporting that the fuel used in these emission units is pipeline grade natural gas.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION (EU0030 AND EU0040)-002
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitations:

1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
   New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971 or in the Springfield metropolitan area after September 24, 1971.
2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

1) The permittee shall conduct opacity readings on these emission units using the procedures contained

in Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.

2) The following monitoring schedule must be maintained:
   a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
   b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
   c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.

   If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source has already performed the weekly and biweekly monitoring and is doing semi-annual monitoring in compliance with a previous permit, the weekly and biweekly monitoring do not need to be repeated.

Record Keeping:

1) The permittee shall maintain records of all Method 22 observation results (See Attachment F1 or F2.), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
2) The permittee shall maintain records of any equipment malfunctions. (See Attachment E.)
3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment G.)
4) Attachments F1 or F2, E, and G are forms satisfying these record keeping requirements. These forms or equivalents created by the permittee must be used to certify compliance with this requirement.
5) These records shall be maintained for five years. They must be maintained on-site for two years. They may be kept in either written or electronic form.
6) These records shall be made available immediately for inspection to Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.

Reporting:

1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to Springfield Air Quality Control, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
2) The permittee shall report any deviations from the monitoring, record keeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION (EU0030 AND EU0040)-003

Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 2 Visible Air Contaminants from Equipment

Emission Limitation:

No person shall discharge or permit the discharge of, into the outside atmosphere, from any single new source of emission whatsoever, any air contaminant:

1) Of a shade or density equal to or darker than that designated as number 1 on the Ringelmann smoke chart (20 percent opacity); or
2) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke of a shade or density equal to or darker than that designated as number 1 on the Ringelmann smoke chart (20 percent opacity).
3) Exceptions:
   a) Air contaminants of a shade, density or opacity equal to but not darker than that designated as number 2 on the Ringelmann chart (40% opacity) so long as the emission shall not exist for a period aggregating more than six minutes in any consecutive 60-minute period;
   b) Air contaminants of a shade, density or opacity equal to but not darker than that designated as number 3 (60% opacity) on the Ringelmann chart so long as the emission shall not exist for a period aggregating more than six minutes in any consecutive 60-minute period and the emission is caused by the starting of or cleaning of a fire, and so long as such emissions do not occur on more than three occasions during any consecutive 24-hour period;
   c) Air contaminants which fail to meet the requirements of section 6-211 or 6-212 only because of the presence therein of uncombined water; or
   d) Air contaminants resulting from an unavoidable breakdown or malfunction of equipment.

MonitoringRecord Keeping/Reporting:

When in compliance with Permit Condition (EU0030 and EU0040)-002, which has more stringent opacity limitations than this one, the permittee will also be in compliance with this permit condition. No additional monitoring, record keeping, or reporting is required.

PERMIT CONDITION (EU0030 AND EU0040)-004

Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 3 Particulate Matter from Fuel Burning Equipment

Emission Limitations:

1) The permittee shall not cause, allow or permit the emission of particulate matter from the Spray Dryer for Powdered Cheese (EU0030) in excess of 3.6 pounds per hour. Attachment H explains how this figure was obtained from the ordinance.
2) The permittee shall not cause, allow or permit the emission of particulate matter from the Drum Dryer Exhaust in excess of 2.3 pounds per hour. Attachment H explains how this figure was obtained from the ordinance.
3) Compliance with this emission limitation shall not be determined during periods when a new fire is being built, during start-up, change of load or fueling, during an operational breakdown or other emergency conditions, while air pollution control equipment is being cleaned or repaired, or during soot blowing, but shall be determined during steady state conditions.

Operational Limitations:

1) These emission units shall be limited to burning natural gas.
2) The wet scrubbers and baghouse which are connected to these emission units shall be maintained and operated according to manufacturer specifications and recommendations.

Monitoring:

1) Operational Limitation 1) for this permit condition is less restrictive than the operational limitation for permit condition (EU0030 and EU0040)-001. When in compliance with that operational limitation, the permittee will also be in compliance with this one.
2) The permittee shall monitor the wet scrubbers which are connected to these emission units as follows.
   a) The permittee shall monitor the liquid flow rate at the pump discharge or at the scrubber liquor inlet of each wet scrubber at least once per week.
   b) The permittee shall inspect the liquor flow rate instrumentation on each wet scrubber at least once per week to ensure that accurate readings are taken.
   c) The permittee shall calibrate, maintain, and operate the instrumentation and wet scrubbers according to manufacturer specifications and recommendations.
3) The permittee shall monitor the baghouse which is connected to the Drum Dryer Exhaust (EU0040) as follows.
   a) The permittee shall check the baghouse pressure drop weekly. If the pressure drop fails the manufacturer's recommended operating range, the permittee shall take corrective action within eight (8) hours to return the pressure drop to the recommended range.
   b) The permittee shall check the cleaning sequence of the baghouse semi-annually.
   c) The permittee shall thoroughly inspect bags for leaks and wear semi-annually.
   d) The permittee shall inspect every six (6) months all components that are not subject t wear or plugging, including structural components, housing, ducts, and hoods.
   e) If leaks or abnormal conditions are detected, the permittee shall implement the appropriate measures for remediation within eight (8) hours. The permittee shall document bag replacement. The permittee shall maintain a written record of the inspection and any action resulting from the inspection. The permittee shall calibrate, maintain, and operate all instruments and control equipment according to the manufacturer specifications.

Record Keeping:

1) The permittee will be in compliance with this regulation as long these emission units are in compliance with the operational limitations above. Attachment H contains calculations demonstrating this. The permittee shall keep this attachment with the rest of this permit.
2) The permittee shall keep records of the weekly measurements of liquid flow rate at the pump discharge or at the scrubber liquor inlet for each wet scrubber.
3) The permittee shall keep records of all wet scrubber inspections, calibrations, maintenance activities, scrubber down times, and corrective maintenance actions taken by the permittee in order to ensure optimal performance of the scrubbers.
4) The permittee shall keep records of the weekly measurements of baghouse pressure drop.
5) The permittee shall keep records of all baghouse checks, inspections, calibrations, maintenance activities, and corrective maintenance actions taken by the permittee in order to ensure optimal performance of the baghouse.

Reporting:

1) The permittee shall report semi-annually all occurrences when either or both of the wet scrubber liquid flow rates exceeded the manufacturer specifications and recommendations. For each such exceedance during the reporting period, this report shall give the day it was noted and its duration. Additionally, the report shall give a detailed explanation of why the exceedance(s) occurred and the corrective action(s) taken by the permittee. If no such exceedances occurred during the reporting period, the report shall so state.
2) The permittee shall report semi-annually all occurrences when the baghouse pressure drop failed the manufacturer's recommended operating range. For each such exceedance during the reporting period , this report shall give the day it was noted and its duration. Additionally, the report shall give a detailed explanation of why the exceedance(s) occurred and the corrective action(s) taken by the permittee. If no such exceedances occurred during the reporting period, the report shall so state.
3) Both wet scrubber and baghouse exceedances may be combined in one semi-annual report. The semi-annual report(s) shall be postmarked by October 1st for monitoring which covers the January through June time period and by April 1st for monitoring which covers the July through December time period. It shall be submitted to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to Springfield Air Quality Control, 227 East Chestnut Expressway, Springfield, MO 65802,
4) The permittee shall submit a summary that all required checks of the wet scrubbers and baghouse were done within the annual period in the annual compliance report required by Section V of this permit. If any of these checks were not done, the permittee shall also report the date and a detailed explanation of why the check was not done.
5) The permittee shall report any deviations from the monitoring, record keeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification, as required by Section V of this permit.

PERMIT CONDITION (EU0030 and EU0040)-005

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes and Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 4 Particulate Matter from Industrial Processes

Emission Limitations:

1) The permittee shall not shall cause, allow or permit the emission into the outdoor atmosphere of particulate matter in any one hour from either of these emission units in excess of 5.98 pounds. Using the process weight of 1.76 tons/hr from the permit application, this figure can be obtained either by using the equation

   $E = 4.10P^{0.67}$ where E is Emission limit and P is process weight

   or by interpolating from the amounts shown in Table 1 of Section 6-154 of the Code of the City of Springfield, Missouri
2) No person shall cause, allow, or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust.

Monitoring/Record Keeping/Reporting:

When in compliance with Permit Condition (EU0030 and EU0040)-004, which is more stringent than this one, the permittee will also be in compliance with this permit condition. No additional monitoring, record keeping, or reporting is required.

EU0050 THROUGH EU0160 – OTHER			
Emission Unit	Description	Year/Manufacturer/ Model #	2004 EIQ Reference #
EU0050	Grain Receiving Railcar Unloading in Train Shed	Unknown	EP-04
EU0060	Flour Regrind Dust Collector	1975/Buhler-Miag/Type A	EP-05
EU0070	Flour Regrind Pasta Receiving Filter Exhaust	1975/Buhler-Miag/Type A	EP-06
EU0080	Flour Regrind Pasta Mill Exhaust	1975/Buhler-Miag/Type A	EP-07
EU0090	Process Flour Holding Tank Dust Collector (Regrind Room)	1975/Buhler-Miag/Type A	EP-08
EU0100	Flour Unloading Vacuum Exhaust	Unknown	EP-22
EU0110	Baghouse for Drying Plant Powders (formerly called Liquid DCO Process)	1999/ Mikro Pulsaire/86S-8-20	DP-7
EU0120	Pasta 2nd Floor Conveyor Dust Collector	2004/Flex-Kleen/FK011309	EP-41
EU0130	Natural Cuts Bulk Powder Dumping Dust Collector	1992/Vac-U-Max/Z38478	EP-42
EU0140	Final Dryer D Finished Goods Dust Collector	1974/Buhler-Miag/Type E, Size 9, serial 74-142	EP-43
EU0150	Natural Cuts Boudalay Dust Collector	1996/Whirl Wet/WW-50	E-20
EU0160	Bean Gum Exhaust	Unknown	EP-12

PERMIT CONDITION (EU0050 THROUGH EU0160)-001

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitations:

1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
   New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971 or in the Springfield metropolitan area after September 24, 1971.
2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

1) The permittee shall conduct opacity readings on these emission units using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or

believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.

2) The following monitoring schedule must be maintained:
   a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
   b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
   c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.

   If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source has already performed the weekly and biweekly monitoring and is doing semi-annual monitoring in compliance with a previous permit, the weekly and biweekly monitoring do not need to be repeated.

Record Keeping:

1) The permittee shall maintain records of all Method 22 observation results (See Attachment F1 or F2.), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
2) The permittee shall maintain records of any equipment malfunctions. (See Attachment E.)
3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment G.)
4) Attachments F1 or F2, E, and G are forms satisfying these record keeping requirements. These forms or equivalents created by the permittee must be used to certify compliance with this requirement.
5) These records shall be maintained for five years. They must be maintained on-site for two years. They may be kept in either written or electronic form.
6) These records shall be made available immediately for inspection to Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.

Reporting:

1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to Springfield Air Quality Control, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
2) The permittee shall report any deviations from the monitoring, record keeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION (EU0050 THROUGH EU0160)-002

Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 2 Visible Air Contaminants from Equipment

Emission Limitation:

No person shall discharge or permit the discharge of, into the outside atmosphere, from any single new source of emission whatsoever, any air contaminant:

1) Of a shade or density equal to or darker than that designated as number 1 on the Ringelmann smoke chart (20 percent opacity); or
2) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke of a shade or density equal to or darker than that designated as number 1 on the Ringelmann smoke chart (20 percent opacity).
3) Exceptions:
   a) Air contaminants of a shade, density or opacity equal to but not darker than that designated as number 2 on the Ringelmann chart (40% opacity) so long as the emission shall not exist for a period aggregating more than six minutes in any consecutive 60-minute period;
   b) Air contaminants of a shade, density or opacity equal to but not darker than that designated as number 3 (60% opacity) on the Ringelmann chart so long as the emission shall not exist for a period aggregating more than six minutes in any consecutive 60-minute period and the emission is caused by the starting of or cleaning of a fire, and so long as such emissions do not occur on more than three occasions during any consecutive 24-hour period;
   c) Air contaminants which fail to meet the requirements of section 6-211 or 6-212 only because of the presence therein of uncombined water; or
   d) Air contaminants resulting from an unavoidable breakdown or malfunction of equipment.

MonitoringRecord Keeping/Reporting:

When in compliance with Permit Condition (EU0050 through EU0160)-001, which is more stringent than this one, the permittee will also be in compliance with this permit condition. No additional monitoring, record keeping, or reporting is required.

PERMIT CONDITION (EU0050 THROUGH EU0140)-003

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes and Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 4 Particulate Matter from Industrial Processes

Emission Limitations:

1) The permittee shall not shall cause, allow or permit the emission into the outdoor atmosphere of particulate matter in any one hour from any of these emission units in excess of the rate listed for that emission unit in the following table. Attachment I explains how these figures were obtained from the regulation and ordinance.

Emission Unit	Description	Particulate Matter Emission Limit, (lb/hr)
EU0050	Grain Receiving Railcar Unloading in Train Shed	50.32
EU0060	Flour Regrind Dust Collector	34.42
EU0070	Flour Regrind Pasta Receiving Filter Exhaust	44.20
EU0080	Flour Regrind Pasta Mill Exhaust	44.20
EU0090	Process Flour Holding Tank Dust Collector	34.42
EU0100	Flour Unloading Vacuum Exhaust	47.58
EU0110	Baghouse for Drying Plant Powders	8.56
EU0120	Pasta 2nd Floor Conveyor Dust Collector	2.18
EU0130	Natural Cuts Bulk Powder Dumping Dust Collector	3.70
EU0140	Final Dryer D Finished Goods Dust Collector	34.42

concentration in excess of 0.30 grain per standard cubic foot of exhaust.

Monitoring/Recordkeeping/Reporting:
The permittee will always be in compliance with this permit condition. Attachment I contains calculations demonstrating this. The permittee shall keep this attachment with the rest of this permit. No monitoring, additional recordkeeping, or reporting is required.

PERMIT CONDITION EU0150-003

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes and Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 4 Particulate Matter from Industrial Processes

Emission Limitations:
1) The permittee shall not cause, allow or permit the emission of particulate matter from the Natural Cuts Boudalay Dust Collector (EU0150) in excess of 0.17 pounds per hour. Attachment I explains how this figure was obtained from the regulation and ordinance.
2) No person shall cause, allow, or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust.

Operational Limitation:
The wet scrubber which is connected to this emission unit shall be maintained and operated according to manufacturer specifications and recommendations.

Monitoring:
The permittee shall monitor the wet scrubber which is connected to this emission units as follows.
1) The permittee shall monitor the liquid flow rate at the pump discharge or at the scrubber liquor inlet of the wet scrubber at least once per week.
2) The permittee shall inspect the liquor flow rate instrumentation on the wet scrubber at least once per week to ensure that accurate readings are taken.
3) The permittee shall calibrate, maintain, and operate the instrumentation and wet scrubber according to manufacturer specifications and recommendations.

Record Keeping:
1) The permittee will be in compliance with this regulation as long this emission unit is in compliance with the operational limitation above. Attachment I contains calculations demonstrating this. The permittee shall keep this attachment with the rest of this permit.
2) The permittee shall keep records of the weekly measurements of liquid flow rate at the pump discharge or at the scrubber liquor inlet for the wet scrubber.
3) The permittee shall keep records of all wet scrubber inspections, calibrations, maintenance activities, scrubber down times, and corrective maintenance actions taken by the permittee in order to ensure optimal performance of the scrubber.

Reporting:
1) The permittee shall report semi-annually all occurrences when the wet scrubber liquid flow rates exceeded the manufacturer specifications and recommendations. For each such exceedance during the time period, this report shall give the day it was noted and its duration. Additionally, the report shall give a detailed explanation of why the exceedance(s) occurred and the corrective action(s)

taken by the permittee. If no such exceedances occurred during the reporting period, the report shall so state.

2) The semi-annual report(s) shall be postmarked by October 1st for monitoring which covers the January through June time period and by April 1st for monitoring which covers the July through December time period. It shall be submitted to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to Springfield Air Quality Control, 227 East Chestnut Expressway, Springfield, MO 65802,
3) The permittee shall submit a summary that all required checks of the wet scrubber were done within the annual period in the annual compliance report required by Section V of this permit. If any of these checks were not done, the permittee shall also report the date and a detailed explanation of why the check was not done.
4) The permittee shall report any deviations from the monitoring, record keeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification, as required by Section V of this permit.

PERMIT CONDITION EU0160-003

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes and Code of the City of Springfield, Missouri, Chapter 6, Article III, Division 4 Particulate Matter from Industrial Processes

Emission Limitations:

1) The permittee shall not cause, allow or permit the emission of particulate matter from the Bean Gum Exhaust (EU0160) in excess of 0.63 pounds per hour. Attachment I explains how this figure was obtained from the regulation and ordinance.
2) No person shall cause, allow, or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust.

Operational Limitation:

The fabric filter which controls emissions from this emission unit shall be maintained and operated according to manufacturer specifications and recommendations.

Monitoring:

The permittee shall monitor the fabric filter which controls emissions from this emission units as follows.

1) The permittee shall inspect the fabric filter for leaks or tears at least once per week.
2) The permittee shall maintain, and operate the fabric filter according to manufacturer specifications and recommendations.

Record Keeping:

1) The permittee will be in compliance with this regulation as long this emission unit is in compliance with the operational limitation above. Attachment I contains calculations demonstrating this. The permittee shall keep this attachment with the rest of this permit.
2) The permittee shall keep records of all fabric filter inspections, maintenance activities, times during which the emission unit was operated without the fabric filter or with the fabric filter damaged or not in compliance with manufacturer specifications and recommendations, and corrective maintenance actions taken by the permittee in order to ensure optimal performance of the filter.

Reporting:

1) The permittee shall report semi-annually all occurrences when the fabric filter was not in operation, was damaged, or was not in compliance with manufacturer specifications and recommendations. This semi-annual report shall give the day an exceedance was noted and its duration for each such occurrences during that time period. Additionally, the report shall give a detailed explanation of the reason for the occurrence and the corrective action(s) taken by the permittee. If there were no such occurrences during the time period, the report shall so state.
2) The semi-annual report(s) shall be postmarked by April 1st for monitoring which covers the January through June time period and by October 1st for monitoring which covers the July through December time period. It shall be submitted to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and to Springfield Air Quality Control, 227 East Chestnut Expressway, Springfield, MO 65802,
3) The permittee shall submit a summary that all required checks of the fabric filter were done within the annual period in the annual compliance report required by Section V of this permit. If any of these checks were not done, the permittee shall also report the date and a detailed explanation of why the check was not done.
4) The permittee shall report any deviations from the monitoring, record keeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification, as required by Section V of this permit.

• Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

Springfield City Code Article XVI Breakdown of Equipment

In the event that emissions as a direct result of upset conditions or breakdown exceed any of the established limits, the permittee shall advise the city of Springfield Director of Health of such a breakdown and outline a corrective program acceptable to the Director.

This requirement is not federally or state enforceable.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take

appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

Springfield City Code Article III Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique

proven to be accurate and approved by the director.

2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-4.090 or Springfield City Code Article VIII Open Burning Restrictions

1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
   a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
   b) The schedule of burning operations;
   c) The exact location where open burning will be used to dispose of the trade wastes;
   d) Reasons why no method other than open burning is feasible; and
   e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Kraft Foods Global, Inc. from the provisions of any other law, ordinance or regulation.
5) The permittee shall maintain files with letters from the director approving the open burning

operation and previous DNR inspection reports.

10 CSR 10-4.070 Restriction on Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

Springfield City Code Article X Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

1) Residential, recreational, institutional, retail sales, hotel or educational premises.
2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed.

This requirement is not federally enforceable.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
   b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).

e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.
2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
      ii) 10 CSR 10-6.040, "Reference Methods";
      iii) 10 CSR 10-6.070, "New Source Performance Standards";
      iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
   b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

• General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 and to the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802.
   b) The permittee shall submit a report of all required monitoring by:
      i) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 90 days after the end of the calendar six months in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
   d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
      ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

1) June 21, 1999;
2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B, and §(6)(C)3.D; and §(5)(C)3, and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative

defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
b) That the installation was being operated properly,
c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
   b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
   c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Joseph Metzger, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

• Attachments

Attachments follow.

Attachment A
Monthly PM-10 Emissions Tracking Record

Company Name: Kraft Foods Global, Inc., Installation ID: 077-0026

This worksheet is for _____, _____
Month Year

Emission Unit *	Throughput (tons)	PM-10 Emission Factor (lb/ton)**	Overall Control Efficiency (%)	PM-10 Monthly Emissions (tons)***
EU0010, Boiler # 1				
EU0020, Boiler # 2				
EU0030, Spray Dryer for Powdered Cheese, fuel				
EU0030, Spray Dryer for Powdered Cheese, product				
EU0040, Drum Dryer Exhaust, fuel				
EU0040, Drum Dryer Exhaust, product				
EU0050, Grain Receiving Railcar Unloading in Train Shed				
EU0060, Flour Regrind Dust Collector				
EU0070, Flour Regrind Pasta Receiving Filter Exhaust				
EU0080, Flour Regrind Pasta Mill Exhaust				
EU0090 Process Flour holding Tank Dust Collector (Regrind Room)				
EU0100, Flour Unloading Vacuum Exhaust				
EU0110, Baghouse for Drying Plant Powders				
EU0120, Pasta 2nd Floor Conveyor Dust Collector				
EU0130, Natural Cuts Bulk Powder Dumping Dust Collector				
EU0140, Final Dryer D Finished Goods Dust Collector				
EU0150, Natural Cuts Boudalay Dust Collector				
EU0160, Bean Gum Exhaust				
Any new (not in this permit) PM-10 emission units				
Total PM-10 emissions for all emission units for this month and year				
Total cumulative PM-10 emissions for most recent 12 months				

* EU0010 and EU0020 PM-10 emissions are from fuel only. EU0030 and EU0040 PM-10 emissions are from both fuel and product. Other emission unit PM-10 emissions are from product only.

** Obtain PM-10 Emission Factor from U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

*** PM-10 Monthly Emissions = Throughput X PM-10 Emission Factor X Overall Control Efficiency) X 0.0005 ton/lb

If total cumulative PM-10 emissions for most recent 12 months is less than 90.00 tons, the installation is in compliance with Permit Condition PW001.

Attachment B
Monthly SO_2 Emissions Tracking Record

Company Name: Kraft Foods Global, Inc., Installation ID: 077-0026

EU0010 (Boiler #1), EU0020 (Boiler #2), EU0030 (Spray Dryer for Powdered Cheese), and EU0040 (Drum Dryer Exhaust.) are the only emissions units with the potential to emit SO_2.

Month, Year	Emission Unit	Fuel Input (unit)	SO_2 Emission Factor (lb/unit) *	Overall Control Efficiency (%)	SO_2 Monthly Emissions ** (tons)	SO_2 Past 12 Month Total Emissions (tons)
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					

* If Fuel Input is in MMBTU and emission unit is burning natural gas, SO_2 Emission Factor is 0.60 lb/MMBTU. Otherwise, obtain SO_2 Emission Factor from U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

** SO_2 Monthly Emissions = Fuel Input X SO_2 Emission Factor X (100% – Overall Control Efficiency) X 0.0005 ton/lb

If SO_2 Past 12 Month Total Emissions is less than 90.00 tons, the installation is in compliance with Permit Condition PW002.

Attachment C

Monthly NO_X Emissions Tracking Record

Company Name: Kraft Foods Global, Inc., Installation ID: 077-0026

Note: EU0010 (Boiler #1), EU0020 (Boiler #2), EU0030 (Spray Dryer for Powdered Cheese), and EU0040 (Drum Dryer Exhaust.) are the only emissions units with the potential to emit NO_X.

Month, Year	Emission Unit	Fuel Input (unit)	NO_X Emission Factor (lb/unit) *	Overall Control Efficiency (%)	NO_X Monthly Emissions (tons)**	NO_X Past 12 Month Total Emissions (tons)
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					

* If Fuel Input is in MMBTU and emission unit is burning natural gas, NO_X Emission Factor is 100.00 lb/MMBTU. Otherwise, obtain NO_X Emission Factor from U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

** NO_X Monthly Emissions = Fuel Input X NO_X Emission Factor X (100% - Overall Control Efficiency) X 0.0005 ton/lb

If NO_X Past 12 Month Total Emissions is less than 90.00 tons, the installation is in compliance with Permit Condition PW003.

Attachment D
Monthly CO Emissions Tracking Record

Company Name: Kraft Foods Global, Inc., Installation ID: 077-0026

Note: EU0010 (Boiler #1), EU0020 (Boiler #2), EU0030 (Spray Dryer for Powdered Cheese), and EU0040 (Drum Dryer Exhaust.) are the only emissions units with the potential to emit CO.

Month, Year	Emission Unit	Fuel Input (unit)	CO Emission Factor (lb/unit) *	Overall Control Efficiency (%)	CO Monthly Emissions (tons)**	CO Past 12 Month Total Emissions (tons)
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					
	EU0010					
	EU0020					
	EU0030					
	EU0040					
	Total of all emission units for this month and year					

* If Fuel Input is in MMBTU and emission unit is burning natural gas, CO Emission Factor is 84.00 lb/MMBTU. Otherwise, obtain CO Emission Factor from U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

** CO Monthly Emissions = Fuel Input * CO Emission Factor* 0.0005 ton/lb

If CO Past 12 Month Total Emissions is less than 90.00 tons, the installation is in compliance with Permit Condition PW004.

Attachment E
Inspection/Maintenance/Repair/Malfunction Log

Date	Equipment/Emission Unit	Activities Performed

Attachment F1

Method 22 (Outdoor Observation Log)	
Emission Unit	
Observer	Date
Sky Conditions	
Precipitation	
Wind Direction	Wind Speed
Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.	

Observation Clock Time	Observation Period Duration (minute:second)	Accumulative Emission Time (minute:second)
Begin Observation		
End Observation		

Attachment F2

Method 22 Opacity Emission Observations			
Date	Method 22 Test Observer	Visible Emissions (yes/no)	If visible emissions, was a method 9 done? (yes/no)

Attachment G

Method 9 Opacity Emission Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Min	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.
Was the emission unit in compliance at the time of evaluation? ____ ____ _____
YES NO Signature of Observer

Attachment H

This attachment may be used to demonstrate that Boiler #1 and Boiler #2 (EU0010 and EU0020) are in compliance with Permit Condition (EU0010 and EU0020)-003, and that the Spray Dryer for Powdered Cheese (EU0030) and the Drum Dryer Exhaust (EU0040) are in compliance with Permit Conditions (EU0030 and EU0040)-004 and (EU0030 and EU0040)-005. These permit conditions are based on Springfield Ordinance Article III, Division 3, Sections 6-231 through 6-237, Particulate Matter from Fuel Burning Equipment and on 10 CSR 10-6.400, Restriction of Emission of Particulate Matter from Industrial Processes.

Limitation on Pounds per Hour of PM-10 Emissions

All four emission units are used to calculate the total heat input for the installation. The permit application specifies that the Boiler #1 and Boiler #2 (EU0010 and EU0020) each have a Maximum Hourly Design Rate (MHDR) of 72.5 MMBtu/hr, that the Spray Dryer for Powdered Cheese (EU0030) has an MHDR of 11.0 MMBtu/hr, and that the Drum Dryer Exhaust (EU0040) has an MHDR of 7 MMBtu/hr. The total heat input for the installation is thus 72.5 + 72.5 + 11.0 + 7 = 163 MMBtu/hr.

The emission limit is obtained by linear interpolation between the rates given for the two nearest total heat inputs in the Springfield ordinance, as follows.

0.35 lb/MMBtu for total heat input of 100 MMBtu
0.24 lb/MMBtu for total heat input of 500 MMBtu
E for total heat input of 163 MMBtu:
E = 0.35 lb/MMBtu – (163 MMBtu – 100 MMBtu) / (500 MMBtu – 100 MMBtu) X
(0.35 lb/MMBtu – 0.24 lb/MMBtu) = 0.33 lb/MMBtu

or

E = 0.24 lb/MMBtu + (500 MMBtu - 163 MMBtu) / (500 MMBtu – 100 MMBtu) X
(0.35 lb/MMBtu – 0.24 lb/MMBtu) = 0.33 lb/MMBtu

For each boiler, the emission limit is:

(0.33 lb/MMBtu) X (72.5 MMBtu/hr) = 23.9 lb/hr

For the Spray Dryer for Powdered Cheese, the emission limit is:

(0.33 lb/MMBtu) X (11.0 MMBtu/hr) = 3.6 lb/hr

For the Drum Dryer Exhaust, the emission:

(0.33 lb/MMBtu) X (7 MMBtu/hr) = 2.3 lb/hr

The boilers normally burn natural gas, although they can burn distillate fuel oil as a backup fuel. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition gives emission factors for natural gas combustion (in Table 1.4.2) as 7.6 lb/10^6scf and for distillate fuel oil (in Table 1.3.1) as 2 lb/10^3gal. These emission factors can be converted to lb/MMBtu as follows.

7. 6 lb/10^6scf natural gas X 10^6scf natural gas/1020 MMBtu = 0.0075 lb/MMBtu
2 lb/10^3gal distillate X 42 gal distillate/bbl X bbl distillate/5.9MMBtu = 0.014 lb/MMBtu

Potential Emission Rate = Heat Input X Emission Factor

For each of the boilers EU0010 and EU0020, the potential emission rate when burning natural gas is:

0.0075 lb/MMBtu X 72.5 MMBtu/hr = 0.5 lb/hr

and the potential emission rate when burning distillate fuel oil is:

0.014 lb/MMBtu X 72.5 MMBtu/hr = 1.0 .lb/hr

For EU0030, the potential emission rate from burning natural gas is:
(0.0075 lb/MMBtu X 11.0 MMBtu/hr = 0.08 lb/hr
and the potential emission rate from the product, using the emission factor of 2.59 lb/ton of product with a capture efficiency of 100% and an overall control efficiency of 92.6% from the permit application, is:
(2.59 lb/ton of product) X (1.76 tons of product/hr) X (1-0.925) = 0.34 lb/hr
so the total potential emission rate is:
0.08 lb/hr + 0.34 lb/hr = 0.4 lb/hr
For EU0040, the potential emission rate from burning natural gas is:
(0.0075 lb/MMBtu X 7 MMBtu/hr = 0.05 lb/hr
and the potential emission rate from the product, using the emission factor of 90.00 lb/ton of product with a capture efficiency of 100% and an overall control efficiency of 99.2% from the permit application, is:
(90.00 lb/ton of product) X (1.76 tons of product/hr) X (1-0.992) = 1.27 lb/hr
so the total potential emission rate is:
0.05 lb/hr + 1.27 lb/hr = 1.3 lb/hr

As the table below shows, the potential emission rates are less than the respective emission limits. Therefore the emission units will be in compliance as long as they burn exclusively natural gas or, in the case of the boilers only, distillate fuel oil.

Emission Unit #	Description	Potential PM-10 Emission Rate	Allowable PM-10 Emission Rate	In Compliance?
EU0010	Boiler #1	1.0 lb/hr (max)	23.9 lb/hr	Yes
EU0020	Boiler #2	1.0 lb/hr (max)	23.9 lb/hr	Yes
EU0030	Spray Dryer for Powdered Cheese	0.4 lb/hr	3.6 lb/hr	Yes
EU0040	Drum Dryer Exhaust	1.3 lb/hr	2.3 lb/hr	Yes

Limitation of 0.30 Grain per Standard Cubic Foot of Exhaust

This limitation, from 10 CSR 10-6.400, applies only to the Spray Dryer for Powdered Cheese EU0030 and the Drum Dryer Exhaust EU0040.

For EU0030, the stack/vent flow rate is 14000 ft^3/min = 14000 ft^3/min X 60 min/hr = 840000 ft^3/hr
For EU0040, the stack/vent flow rate is 25500 ft^3/min =25500 ft^3/min X 60 min/hr = 1530000 ft^3/hr
These figures are from the 2004 Emission Inventory Questionnaire.

Converting the allowable PM-10 emission rates from lb/hr to grains/ft^3 using the above figures gives:
For EU0030: 3.6 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/840000 ft^3 = 0.03 grain/ft^3
For EU0040: 2.3 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/1530000 ft^3 = 0.01 grain/ft^3
These lb/hr limitations are both more stringent than 0.30 grain/ft^3. When in compliance with the former, these emission units are also in compliance with the latter.

Attachment I

This attachment may be used to demonstrate that emission units EU0050 through EU0140 are in compliance with Permit Condition (EU0050 through EU00140)-003, that emission unit EU0150 is in compliance with Permit Condition EU0150-003, and that emission unit EU0160 is in compliance EU0160-003. These permit conditions are based on 10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes and Springfield Ordinance Article III, Division 3, Sections 6-251 through 6-257, Particulate Matter from Industrial Processes.

Limitation on Pounds per Hour of PM-10 Emissions

Emission Unit #	Description	MHDR/ Process Weight Rate (tons/hr)	Emission Factor (lb/ton)	Overall Control Efficiency (%)	Potential PM-10 Emission Rate (lb/hr)	Allowable PM-10 Emission Rate (lb/hr)	In Compliance?
EU0050	Grain Receiving Railcar Unloading in Train Shed	92	0.08	93.75	0.46	50.32	Yes
EU0060	Flour Regrind Dust Collector	24	0.08	89.5	0.20	34.42	Yes
EU0070	Flour Regrind Pasta Receiving Filter Exhaust	48	0.08	89.5	0.40	44.20	Yes
EU0080	Flour Regrind Pasta Mill Exhaust	48	0.08	89.5	0.40	44.20	Yes
EU0090	Process Flour Holding Tank Dust Collector	24	0.08	89.5	0.20	34.42	Yes
EU0100	Flour Unloading Vacuum Exhaust	68.7	0.015	99.5	0.01	47.58	Yes
EU0110	Baghouse for Drying Plant Powders	3.0	0.08	98.0	0.05	8.56	Yes
EU0120	Pasta 2nd floor Conveyor Dust Collector	0.39	0.08	99.5	0.001	2.18	Yes
EU0130	Natural Cuts Bulk Powder Dumping Dust Collector	0.86	0.08	89.5	0.01	3.70	Yes
EU0140	Final Dryer D Finished Goods Dust Collector	24	0.08	89.5	0.20	34.42	Yes
EU0150	Natural Cuts Boudalay Dust Collector	0.015	20.00	74.0	0.08 *	0.17	Yes
EU0160	Bean Gum Exhaust	0.061	77	89.5	0.49 *	0.63	Yes

* EU0150 and EU0160 are the only emission units in this table which require a control device to meet their Allowable PM-10 Emission Rates. All other emission units in this table would meet their Allowable PM-10 Emission Rates even without the Overall Control Efficiency factors provided by the control devices on them.

The Maximum Hourly Design Rates (MHDR) and Overall Control Efficiencies are taken from the permit application. The Emission Factors are taken from the 2004 Emission Inventory Questionnaire when available; otherwise, they are assumed to be the same (0.08 lb/hr) as those for similar emission units.

The Potential PM-10 Emission Rates are calculated using the following equation.
Potential PM-10 Emission Rate = MHDR X Emission Factor X (100% – Overall Control Efficiency)

The Allowable PM-10 Emission Rate (E) in lb/hr is first calculated using the following equations.0
$E = 4.10P^{0.67}$ where P is process weight in tons/hr for process weights up to 60,000 lb/hr or
$E = 55P^{0.11} - 40$ where P is process weight in tons/hr for process weights greater than 60,000 lb/hr
and then recalculated by interpolating from the amounts shown in Table 1 in Springfield Ordinance Article III, Division 3, Section 6-154. If these calculations differ, the lower value is used.

Since the potential emission rates are less than the respective emission limits, the emission units will be in compliance as long as the control devices on the Natural Cuts Boudalay Dust Collector and the Bean Gum Exhaust are in operation and maintained correctly.

Limitation of 0.30 Grain per Standard Cubic Foot of Exhaust

This limitation, from 10 CSR 10-6.400 is less stringent than the lb/hr limitations. When in compliance with the latter, these emission units are also in compliance with this limitation. This can be demonstrated as follows.

For EU0050, the stack/vent flow rate is 1507 ft^3/min = 1507 ft^3/min X 60 min/hr = 90420 ft^3/hr
For EU0060, the stack/vent flow rate is 1680 ft^3/min = 1680 ft^3/min X 60 min/hr = 100800 ft^3/hr
For EU0070, the stack/vent flow rate is 2585 ft^3/min = 2585 ft^3/min X 60 min/hr = 155100 ft^3/hr
For EU0080, the stack/vent flow rate is 6104 ft^3/min = 6104 ft^3/min X 60 min/hr = 366240 ft^3/hr
For EU0090, the stack/vent flow rate is 1860 ft^3/min = 1860 ft^3/min X 60 min/hr = 111600 ft^3/hr
For EU0100, the stack/vent flow rate is 2800 ft^3/min = 2800 ft^3/min X 60 min/hr = 168000 ft^3/hr
For EU0110, the stack/vent flow rate is 2000 ft^3/min = 2000 ft^3/min X 60 min/hr = 120000 ft^3/hr
For EU0120, the stack/vent flow rate is 5000 ft^3/min = 5000 ft^3/min X 60 min/hr = 300000 ft^3/hr
For EU0140, the stack/vent flow rate is 1600 ft^3/min = 1600 ft^3/min X 60 min/hr = 96000 ft^3/hr
For EU0150, the stack/vent flow rate is 4500 ft^3/min = 4500 ft^3/min X 60 min/hr = 270000 ft^3/hr
For EU0160, the stack/vent flow rate is 452 ft^3/min = 452 ft^3/min X 60 min/hr = 27120 ft^3/hr
These figures are from the permit application and the 2004 Emission Inventory Questionnaire.

Converting the potential PM-10 emission rates from lb/hr to grains/ft^3 using the above figures gives:
For EU0050: 0.46 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/90420 ft^3 = 0.04 grain/ft^3
For EU0060: 0.20 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/100800 ft^3 = 0.01 grain/ft^3

For EU0070: 0.40 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/155100 ft^3 = 0.02 grain/ft^3
For EU0080: 0.40 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/366240 ft^3 = 0.01 grain/ft^3
For EU0090: 0.20 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/111600 ft^3 = 0.01 grain/ft^3
For EU0100: 0.01 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/168000 ft^3 = 0.0004 grain/ft^3
For EU0110: 0.05 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/120000 ft^3 = 0.003 grain/ft^3
For EU0120: 0.001 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/300000 ft^3 = 0.00002 grain/ft^3
For EU0140: 0.20 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/96000 ft^3 = 0.01 grain/ft^3
For EU0150: 0.08 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/270000 ft^3 = 0.002 grain/ft^3
For EU0160: 0.49 lb/hr X 453.59 g/lb X 15.432 grains/g X hr/27120 ft^3 = 0.13 grain/ft^3

The above emission units are all under 0.30 grain/ft^3 and in compliance.

No stack or vent is associated with EU0130 the Natural Cuts Bulk Powder Dumping Dust Collector. Working the calculation backward for this gives:
For EU0130, ft^3/0.30 grain X 15.432 grains/g X 453.59 g/lb X 0.01 lb/hr = 233 ft^3/hr
This unit would need to have a volume flow of air less than 1% of the stack/flow flow of any other dust collector in the plant in order to be out of compliance. It is not reasonable that even a small open bin would an air flow this small, so the unit can be assumed always to be in compliance.

STATEMENT OF BASIS

Voluntary Limitations
In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Reasons for Listing Emission Units as Without Limitations
The following emission units are listed as without limitations for the following reasons.

1) Cheese cookers at drying plant. This was DP-3 on the emission inventory questionnaires. These devices emit nothing but a trivial amount (0.1785 ton per year) of volatile organic compounds. They are not subject to any New Source Performance Standards, Maximum Available Control Technology regulations, or National Emission Standards for Hazardous Air Pollutants.

2) Pasta pre-dryer exhaust: This was EU0110/EP-09 on the previous operating permit/emission inventory questionnaires However, this emission unit emits only steam, so no regulations apply to it.

3) Pasta final dryer exhaust: This was EU0140/EP-11 on the previous operating permit/emission inventory questionnaires However, this emission unit emits only steam, so no regulations apply to it.

4) Lab ether exhaust: Unless an installation is Part 70, which this one is not, laboratory equipment used exclusively for chemical and physical analysis or experimentation, except for controlling radioactive air contaminants, is exempt from the regulations.

5) Process cheese blenders/cookers: This was EP-26 on the emission inventory questionnaires. These devices emit nothing but a trivial amount (0.3997 ton per year) of volatile organic compounds. They are not subject to any New Source Performance Standards, Maximum Available Control Technology regulations, or National Emission Standards for Hazardous Air Pollutants.

6) Process cheese salt handling room and salt brine silo. This was EU0180/EP-15 and EP-34 on the previous operating permit/emission inventory questionnaires. However, salt handling is an internal process and does not discharge to the ambient air. Salt dusting is drawn into a dust collector and deposited back into a feed hopper.

7) 30,000-gallon fuel oil storage tanks: This was EU0190/EP-28, EP-29 on the previous operating permit and emission inventory questionnaires. See the paragraph below on New Source Performance Standards for an explanation of why those do not apply. No other regulations apply.

Permit Reference Documents
These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1) Intermediate Operating Permit Application, received May 3, 2005.
2) 2004 Emissions Inventory Questionnaire, received March 17, 2005.
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

The Bean Gum Exhaust was not regulated in the previous operating permit because it was supposedly removed. However this was reported on the 2004 Emission Inventory Questionnaire as EP-26, with PM-10 emissions. Therefore it is included in this permit.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

1) 10 CSR 10-4.030, Restriction of Emissions of Particulate Matter from Industrial Processes, no longer applies to this installation, because it was rescinded on March 30, 2001.

2) 10 CSR 10-4.040, Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating, is not applicable to Boiler #1 and Boiler #2 (EU0010 and EU0020.) Per 10 CSR 10-4.040(1)(E), they are exempt because they are subject to 10 CSR 10-6.070. This regulation is not applicable to the Spray Dryer for Powdered Cheese (EU0030) or the Drum Dryer Exhaust (EU0040) either. Per10 CSR 10-4.040(1)(A), they are exempt because they are not indirect heating units.

3) 10 CSR 10-4.060, Restriction of Emission of Visible Air Contaminants, no longer applies to this installation, because it was rescinded on May 30, 2000.

4) In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

5) 10 CSR 10-6.100, Alternate Emission Limits, does not apply to this installation. Per 10 CSR 10-6.100(1)(A), it is exempt because it is in an ozone attainment area.

6) 10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants, does not apply to Boiler #1 or Boiler #2 (EU0010 and EU0020). Per 10 CSR 10-6.220(1)(H), they are exempt because they are subject to 10 CSR 10-6.070.

7) 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds, does not apply to Boiler #1 or Boiler #2 (EU0010 and EU0020.) Per 10 CSR 10-6.260(1)(A)1, they are exempt because they are. subject to an applicable sulfur compound emission limit under 10 CSR 10-6.070.

8) 10 CSR 10-6.400, Restriction of Emissions of Particulate Matter, does not apply to Boiler #1 and Boiler #2 (EU0010 and EU0020). Per 10 CSR 10-6.400(1)(H), they are exempt because they burn fuel for indirect heating.

Construction Permit Revisions

Construction Permit 0898-197 issued August 12, 1998 by the Springfield, Missouri Air Pollution Control Authority, is the only construction permit issued for this facility. This operating permit makes the following revisions to it.

1) The following paragraph is in this construction permit.
"Visible Emission Observations Required
A Kraft Foods employee must perform a regular daily opacity observation of the two Abco boiler stacks using the EPA Region 7 approved Tier 3 method at least once per day (see attached). As per Kraft Foods Part 70 Operating Permit, periodic monitoring is required and a log book of such readings must be made available for inspection by SAQC personnel."

   This operating permit, like the previous one, only requires that opacity observations be made on days when a boiler is burning something other than natural gas. As explained in the paragraph below on New Source Performance Standards Applicability below, natural gas does not produce visible emissions.

2) The following paragraph is taken directly from this construction permit.
"Alternative Fuel Switching
No residual fuel oil (#5 or 6 fuel oil) may be used without prior approval by the SAQC. The Kraft Foods Part 70 Operating Permit must be amended by application which is submitted to the SAQC for review and determination of SO_2 potential emissions."

   This condition is unnecessary, and is not included in this operating permit. This operating permit (which is an intermediate rather than a Part 70) restricts the installation's fuel burning emission points to the use of either natural gas or distillate fuel oil (#2 fuel oil or better.) The permittee would have to submit an application for modification before using another fuel, such as residual fuel oil, or be in violation of this permit. Processing such a modification would involve both the Missouri Department of Revenue and the Springfield, Missouri Air Pollution Control Authority.

New Source Performance Standards Applicability

1) 40 CFR 60 Subpart Dc applies to Boiler #1 and Boiler #2 (EU0010 and EU0020.) However, the opacity limitations are automatically met when they are burning natural gas. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area

Sources, Fifth Edition, states in 1.5.3.1 that liquefied petroleum gas does not produce visible emissions, even though it does produce a small amount of particulate matter. The same is true for natural gas. (See note (a) on Table 1.5.1 in that same section of AP-42.). Therefore these emission units will automatically be in compliance with this regulation when burning natural gas.

2) 40 CFR 60 Subpart Kb does not apply to the 30,000-gallon fuel oil storage tanks. This NSPS for small petroleum liquid storage tanks applies to storage tanks with capacity larger than 40,000 gallons.

No other NSPS apply.

Maximum Available Control Technology Applicability
The installation does not emit any single hazardous air pollutant (HAP) in an amount greater than 10 tons per year nor does it emit an aggregate of all HAPs in an amount greater than 25 tons per year. Therefore, no MACT regulations (40 CFR Part 63) apply to it.

National Emission Standards for Hazardous Air Pollutants Applicability
In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

No other NESHAP apply.

Other Regulatory Determinations

1) 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants, applies to the Spray Dryer for Powdered Cheese (EU0030) and the Drum Dryer Exhaust (EU0040). However, U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition, states in 1.5.3.1 that liquefied petroleum gas does not produce visible emissions, even though it does produce a small amount of particulate matter. The same is true for natural gas. (See note (a) on Table 1.5.1 in that same section of AP-42.). Therefore these emission units will automatically be in compliance with this regulation when burning natural gas. This regulation is included in this permit only for the purpose of limiting these emission units to burning natural gas exclusively

2) 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds, does not apply to the Spray Dryer for Powdered Cheese (EU0030) or the Drum Dryer Exhaust (EU0040) as long as they burn pipeline grade natural gas exclusively, per 10 CSR 10-6.260(A)(1)2. It has been included as a permit condition only for the purpose of restricting these emission units to burning that fuel exclusively.

This exemption for natural gas is not in the State Implementation Plan (SIP) yet. However, as long as an emission unit burns pipeline grade natural gas exclusively, its emission rate for sulfur compounds will be in compliance with the SIP limitations.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

1) The specific pollutant regulated by that rule is not emitted by the installation.
2) The installation is not in the source category regulated by that rule.
3) The installation is not in the county or specific area that is regulated under the authority of that rule.
4) The installation does not contain the type of emission unit which is regulated by that rule.
5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

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